



Arysta LifeScience

January 27, 2012

Document Processing Desk (DCI/PRD)
Jack Brennan
Office of Pesticide Programs (7508P)
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202

Subject: ID # GDCI-099801-1035; Case # 0382
Ethephon Generic Data Call-In
ETHEPHON TECHNICAL (EPA Reg. No. 66330-369)
90-Day Response

Dear Mr. Brennan:

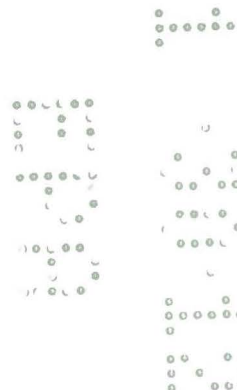
Enclosed please find the 90-day response to the Generic Data Call-In for ethephon from Arysta LifeScience North America, LLC ("Arysta"). Included herein are copies of 1) the Data Call-In Response, 2) the Requirements Status and Registrant's Response and 3) letters from registrants agreeing to share the cost of developing the required data.

Arysta has agreed to share the costs of all the study requirements of this data call-in with Bayer CropScience, Celsius Property B.V. Amsterdam (NL), Nufarm Limited and RedEagle International, LLC (see enclosed letters).

Should you have any questions or require additional information, you may contact me at (919) 678-4886 or by e-mail at alex.hawkins@arystalifescience.com.

Sincerely,

W. A. Hawkins, Jr., Ph.D.
Regulatory Manager



United States Environmental Protection Agency
Washington, D.C. 20460
DATA CALL-IN RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address ARYSTA LIFESCIENCE NORTH AMERICA, LLC 15401 WESTON PARKWAY, SUITE 150 CARY, NC 27513		2. Case # and Name 0382 - Ethephon Chemical # and Name: 099801 Ethephon		3. Date and Type of DCI and Number 26-Oct-2011 GENERIC ID # GDCI-099801-1035	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
66330-369			Yes	N/A	N/A
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <i>W. A. Hawkins Jr. Regulatory Manager</i>				9. Date <i>1/27/12</i>	
10. Name of Company <i>Arysta Life Science North America, LLC</i>				11. Phone Number <i>919-678-4886</i>	

United States Environmental Protection Agency
Washington, D.C. 20460

OMB Approval 2070-0174

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

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1. Company Name and Address ARYSTA LIFESCIENCE NORTH AMERICA, LLC 15401 WESTON PARKWAY, SUITE 150 CARY, NC 27513		2. Case # and Name 0382 - Ethephon Chemical # and Name: 099801 Ethephon			3. Date and Type of DCI and Number 26-Oct-2011 GENERIC ID # GDCI-099801-1035				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Environmental Fate Data Requirements (Conventional Chemical)								
835.4100	Aerobic soil metabolism	N				A,B,I,C,Q	PAIRA; TGAI	24	6
835.6100	Terrestrial field dissipation (5)	N				A,B,I,C,Q	TEP	24	2
835.6200	Aquatic field dissipation (6)	N				A,B,I,C,Q	TEP	24	2
	Nontarget Plant Protection Data Requirements (Conventional Chemical)								
850.4100	Terrestrial Plant Toxicity (Seedling Emergence) (1, 3, 7)	N				A,B,I,C,Q	TEP	12	2
850.4150	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (1, 3, 8)	N				A,B,I,C,Q	TEP	12	2
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)								
850.1075	Fish acute toxicity test, freshwater and marine	N				A,B,I,C,Q	TEP; TGAI	12	2
850.1400	Fish early-life stage toxicity test	N				A,B,I,C,Q	TGAI	12	6
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.							11. Date 1/27/12		
Signature and Title of Company's Authorized Representative <i>W.A. Hawkins, Jr. Regulatory Manager</i>									
12. Name of Company <i>Arysta LifeScience North America, LLC</i>							13. Phone Number <i>919-678-4886</i>		

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			1	2	3				
	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)								
850.2100	Avian acute oral toxicity test (4, 9)	Y				A,B,I,C,Q	TEP; TGAi	12	2
850.3020	Honey bee acute contact toxicity	N				A,B,I,C,Q	TGAi	12	6
	Toxicology Data Requirements (Conventional Chemical)								
870.3465	90-day inhalation toxicity	N				A,B,I,C,Q	TGAi	24	9
870.7800	Immunotoxicity	N				A,B,I,C,Q	TGAi	12	2
835.4300	Aerobic aquatic metabolism	N				A,B,I,C,Q	PAIRA; TGAi	24	6
850.2300	Avian reproduction test	N				A,B,I,C,Q	TGAi	24	6
SS-1037	Greenhouse Foliar Degradation Study (2, 9)	Y				A,B,I,C,Q	EP; PAI; TGAi	24	9